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Penn E&R
Environmental & Remediation, Inc.

August 27, 2001
4013-20000

VIA OVERNIGHT EXPRESS MAIL

Mr. Joseph McDowell (3HS21)
Remedial Project Manager
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103

Subject: Revised Remedial Design/Remedial Action Work Plan for the Cinder/Slag Fill Area Located on Liberty Property Trust's 2301 Renaissance Boulevard Property

Dear Mr. McDowell:

Penn Environmental & Remediation, Inc. (Penn E&R) is submitting this letter, on behalf of Liberty Property Limited Partnership and Liberty Property Trust (collectively "Liberty or LPT"), in response to the EPA's July 31, 2001 letter that outlined comments the Agency had regarding their review of the document entitled "Remedial Design/Remedial Action Work Plan for the Cinder/Slag Fill Area Located on Liberty Property Trust's 2301 Renaissance Boulevard Property," dated July 11, 2001. Our responses to the review comments are provided in the same order and format, as they were included in the EPA's July 31, 2001 letter.

EPA's Comment No. 1, Section 4.1, Proposed Remedial Action, Page 4-1

This section indicates that all waste will be transported to Waste Management's Pottstown Landfill. Section 2.1 (Page 2-3) indicates that Penn E&R has approval from Waste Management for 5,250 tons of material. According to Section 3.0, the estimated volume of waste removal at the CSFA is 4,000 cubic yards. This is approximately 7,200 tons of material. It is not clear whether re-analysis will be required when the 5,250 ton limit is reached or if it is anticipated that Waste Management will issue extensions to the approved limit. If re-analysis is required, it is recommended that this be conducted early with rapid turnaround in order to minimize impact to the construction schedule.

Liberty's Response to EPA's Comment No. 1

Based on previous off-site shipments of a small quantity of material removed from the cinder/slag fill area (CSFA), the fill in this area is very light in comparison to soil. Therefore, a multiplier of 1.3 rather than the standard 1.5 was used to convert cubic yards into tons. Based on this conversion factor, we estimate that there is 5,250 tons of fill material present in the CSFA, which will require off-site disposal.

If there is only a small increase in the total volume of material that ultimately requires off-site disposal, say 5,500 tons rather than 5,250 tons, we should be able to get an extension of the approved limit from Waste Management (WM). However, if the increase in the total volume exceeds much more than 250 tons Liberty will likely be required to submit additional waste characterization sample results. To identify this potential need as early as possible, Penn E&R will continuously review and compare volume estimates versus corresponding weight tickets for individual trucks. If it appears that more than 5,250 tons of material will be removed from the CSFA, Penn E&R will immediately collect the additional waste characterization samples required by WM. The results of these analyses will then be submitted to WM so that an increase in the approved limit can be obtained. If required, any additional waste characterization samples will be analyzed using an accelerated laboratory turnaround time.

EPA's Comment No. 2, Site Preparation, Page 4-3

This section indicates that a truck turnaround area and decontamination pad will be constructed adjacent to the CSFA in order to address any residual contamination, which may have come in contact with the truck and tires. A dirt access road leads from the decontamination pad to the construction entrance. While all potentially hazardous materials will be removed at the decontamination pad and turnaround area, it is likely that the trucks with wet tires will pick up dirt/dust while traveling from the decontamination pad to the construction entrance and onto Renaissance Blvd. Township concerns with contamination leaving the site will be heightened during this remedial action. It is recommended that for the duration of the CSFA remedial action, that a truck tire inspection and spray wash also be set up at the construction entrance to spray down any dirty truck tires leaving the site to mitigate any potential concerns regarding the tracking of mud associated with the removal action onto the public roads. Lastly, the Erosion & Sedimentation Plan needs to be submitted for review.

Liberty's Response to EPA's Comment No. 2

As requested, Liberty will set up a tire inspection and spray wash at the construction entrance for the duration of the remediation of the CSFA. The specifics of this tire inspection and spray wash are outlined in the attached revised Section 4.2.1 of the Remedial Design/Remedial Action Work Plan (RD/RAWP) for the CSFA.

The Montgomery County Conservation District (MCCD) requires the implementation of a written Erosion and Sedimentation Control (ESC) Plan for excavations exceeding 5,000 square feet but less than five acre. Unless mandated by permits issued by other entities, the MCCD does not require involvement in the preparation or implementation of the ESC Plan and does not require a formal permit to initiate the excavation/construction activity. Since the remediation of the CFSA will disturb more than 5,000 square feet but less than five acres, Penn E&R has developed a written ESC Plan for this project. A copy of the ESC Plan, which was developed in accordance with the 1995 document developed by the Southeast Pennsylvania Association of Conservation Districts entitled "Erosion and Sedimentation Control Plan Guide For Small Projects" is included in Attachment 4B, which has been added to the RD/RAWP for the CSFA.

EPA's Comment No. 3, Section 4.2.2, Excavation of the CSFA, Page 4-4

This section should discuss what actions will be taken in the event material is spilled onto the truck loading area. Also, is there a need for a truck weigh station/scale? Lastly, this section should discuss the required placarding for the trucks.

Liberty's Response to EPA's Comment No. 3

The attached revised Section 4.2.2 of the RD/RAWP for the CSFA outlines the activities that will be taken in the event material is spilled onto the truck loading area.

Waste Management will provide a certified weight receipt for each truck that leaves the site. Therefore, Penn E&R does not believe that there is a need to have a scale on-site to weigh the trucks.

The attached revised Section 4.2.2 of the RD/RAWP for the CSFA outlines the placarding that will be included on each truck.

EPA's Comment No. 4, Section 4.2.3, Post Excavation Soil Sampling, Page 4-6

This section indicates that sidewall samples are to be collected at a rate of 1 sample per 100 feet of sidewall. Additionally, confirmation bottom samples are to be collected at a rate of 1 sample per 1,600 square feet. Previously approved sidewall confirmation sampling frequencies for excavations associated with the remediation at other portions of the Crater site were 1 sidewall sample per 50 feet, and 1 bottom sample every 250 square feet. It is recommended that the sidewall sampling frequency be changed to 1 sample per 50 feet of sidewall for consistency between separate tracts of the site. However, the bottom sample requirement of 1 sample per 250 square feet appears excessive for this area. At a frequency of 1 sample per 250 square feet, a total of 120 bottom samples would be required for this area. Consideration should be given to an increased bottom sampling frequency than that proposed; but at a less stringent rate as used for smaller areas of remediation during prior soil removal events.

Liberty's Response to EPA's Comment No. 4

As requested by the USEPA, the attached revised Section 4.2.3 of the RD/RAWP for the CSFA includes the collection of sidewall samples at a frequency of 1 per 50 feet linear feet. Also, the collection of samples from the bottom of the excavation will be at a frequency of 1 sample per 900 square feet of excavation bottom. This revised sampling frequency will result in fifteen sidewall samples and thirty-three bottom samples for a total of forty-eight samples.

EPA's Comment No. 5, Section 4.2.3 Post Excavation Soil Sampling, Page 4-7

This section identifies the contaminants of concern to be analyzed during confirmation sampling. Section 4.3 indicates that site specific cleanup standards are being developed for contaminants that were identified as contaminants of concern. TtNUS/Dynamac collected two independent samples in addition to two split samples of the CSFA in May 2001. Based on an initial comparison of this data to existing risk based screening criteria it appears that chrysene, dibenzofuran, and benzo (g,h,i) perylene are also potential contaminants of concern for the site. Other compounds may also be

present above the screening criteria. It is recommended that this data be considered by Penn E&R for inclusion in the work plans and to support the development of the cleanup criteria.

Liberty's Response to EPA's Comment No. 5

As discussed in the attached revised Section 2.0 of the RD/RAWP for the CSFA, Penn E&R obtained and reviewed the analytical results for samples collected from the CSFA by Tetra Tech NUS/Dynamac. Based on this review, the list of potential compounds of concern for which post-excavation soil samples will be analyzed, as discussed in revised Section 4.2.3 and other appropriate Sections of the RD/RAWP for the CSFA, has been revised and includes the volatile organic compound benzene; the semivolatile organic compounds acetophenone, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, bis(2-ethylhexyl)phthalate, chrysene, dibenzo(a,h)anthracene, dibenzofuran, fluorene, indeno(1,2,3-cd)pyrene, and naphthalene; and the metals antimony, arsenic, cadmium, lead, manganese and thallium.

As discussed in the attached revised Section 4.3 of the RD/RAWP for the CSFA, a focused risk assessment will be implemented to evaluate the effectiveness of the remedial activities and ensure that no unacceptable risks to human health remain after remediation of the CSFA. The FRA will be completed using the results of the post-excavation soil samples. Each post-excavation soil sample will be analyzed for the aforementioned list of compounds.

EPA's Comment No. 6, Section 4.2.3 Post Excavation Soil Sampling, Page 4-7

The last paragraph indicates that additional excavation will be conducted if performance standards are not met. Additional details should be provided including area and depth of soil to be removed at these locations.

Liberty's Response to Comment No. 6

The last paragraph in the attached revised Section 4.2.3 of the RD/RAWP for the CSFA has been revised to include the additional excavation procedures that will be followed if any of the post-excavation samples exhibit any compounds of concern above the site-specific standards.

EPA's Comment No. 7, Section 5.0 Sampling and Analysis Plan

A cover sheet with a preparer and EPA signature block shall be added to this section.

Liberty's Response to Comment No. 7

As requested, a cover sheet with an EPA signature block has been included with the attached revised Section 5.0 of the RD/RAWP for the CSFA.

EPA's Comment No. 8, Section 5.3.6, Laboratory Analyses, Page 5-4

This section indicates that the methods to be utilized for analyses are EPA CLP Methods OLMO4.2 and ILMO4.1. Because the cleanup criteria have not yet been established a determination of the appropriateness of these methods (and the associated detection limits) cannot rendered at this time. The analytical methods for the analysis will be reviewed upon the approval of the cleanup criteria for the action.

Liberty's Response to Comment No. 8

We recommended the use of the CLP methods because we believed that the EPA would require the analytical methodologies since this work is being completed under the Superfund Program. Also, we have spoken directly with CompuChem Laboratory regarding the reporting and method detection limits for the various compounds of concern (COC) for which the post-excavation samples will be analyzed. The COC for which the post-excavation samples will be analyzed and CompuChem's reporting and method detection limits for these compounds are listed below.

Compounds Of Concern	Reporting Limit	Method Detection Limit
Volatiles (ug/kg):		
Benzene	10	NA
Semivolatiles (ug/kg):		
Acetophenone	330	29.95
Benzo(a)anthracene	330	38.21
Benzo(a)pyrene	330	30.96
Benzo(b)fluoranthene	330	56.65
Benzo(k)fluoranthene	330	63.83
Bis(2-ethylhexyl)phthalate	330	66.75
Chrysene	330	36.37
Dibenzo(a,h)anthracene	330	28.84
Dibenzofuran	330	29.04
Fluorene	330	29.15
Indeno(1,2,3-cd)pyrene	330	31.78
Naphthalene	330	20.90
Metals (mg/kg):		
Antimony	12	0.30
Arsenic	2	0.28
Cadmium	1	0.06
Lead	0.3	0.6
Manganese	0.07	3
Thallium	0.72	2

As indicated in the attached revised Section 4.3 of the RD/RAWP for the CSFA, a Focused Risk Assessment (FRA) will be implemented to evaluate the effectiveness of the remedial activities implemented in the CSFA. Based on the exposure scenarios and routes of exposure to be evaluated Penn E&R believes that the listed Reporting Limits (RL) for the COC are low enough to allow the implementation of the FRA. This is especially true for the volatile organic benzene and the metals, which have very low RLs with respect to the listed semivolatile organic compounds. With regards to

the semivolatile organics, the Method Detection Limits (MDL) for these compounds are considerably lower than their corresponding RLs. Under the CLP program, analytical results for organics including semivolatile organic compounds are reported down to the MDL. If a compound is detected below its RL but above its MDL the concentration will be reported but it will be flagged to indicate the quantitated result is estimated. Therefore, if present in the post-excavation samples, the COC will be reported down to the much lower MDLs.

EPA's Comment No. 9, Section 5.4.8.3 Data Reporting. Page 5-20

The UAO requires retention of all records for 10 years.

Liberty's Response to Comment No. 9

The attached revised Section 5.4.8.3 of the RD/RAWP for the CSFA has been revised to indicate that laboratory data will be archived for a period of ten years.

EPA's Comment No. 10, Section 6.0 Site Health and Safety Plan

A cover sheet with the CIH signature block shall be added to this section.

Liberty's Response to Comment No. 10

As requested, a cover sheet with a CIH signature block has been included with the attached revised Section 6.0 of the RD/RAWP for the CSFA.

EPA's Comment No. 11, Section 6.2.3.1 Metals, Page 6-7

This section indicates that personal air monitoring for lead will be conducted the first two days of the remedial action; however, the report does not include specific details regarding the monitoring (e.g., method, turnaround time, laboratory, etc.). In order to support a determination that lead monitoring can be eliminated after the first two days of the action, it is recommended that personal air monitoring samples be subject to 24 hour laboratory analysis to provided data to determine the need for additional monitoring.

Liberty's Response to Comment No. 11

As outlined in revised Section 6.6 of the RD/RAWP for the CSFA, the air samples will be analyzed for lead on an accelerated 24-hour turnaround. The samples will be analyzed by Philip Analytical Services, an American Industrial Hygiene Association accredited laboratory, using NIOSH Method 7300. The Corporate Health and Safety Officer will review the air monitoring results and, if required, will make appropriate modifications to this SSHASP. These results will also be reviewed with EPA to agree upon whether or not continued air monitoring for lead is required.

EPA's Comment No. 12, Section 6.2.3.2 Volatile Organic Compounds, Page 6-7

This section uses a PID threshold of 5 ppm before any action is taken. While the OSHA short term exposure level for benzene is the 5 ppm, the NIOSH short term exposure level for benzene is 1 ppm. Penn E&R may wish to reconsider the screening threshold for the action based on the more conservative value.

Liberty's Response to Comment No. 12

Of the eleven samples collected from the CSFA, none displayed any volatile organic compounds above either USEPA RBCs or PADEP Act 2 direct contact MSCs. This includes the volatile organic compound benzene. Based on these results, volatile organic compounds were not identified as potential contaminants of concern for on-site workers completing the remedial activities. Given these results, Penn E&R believes that the 5 ppm action level established for volatile organics provides a sufficient safety factor for the on-site workers.

EPA's Comment No. 13, Section 6.2.3.3 Semivolatile Organic Compounds, Page 6-7

This section should state modified level D (not C).

Liberty's Response to Comment No. 13

The revised attached Section 6.2.3.3 (Semivolatile Organics) of the RD/RAWP for the CSFA has been revised to change Modified Level C to Modified Level D.

EPA's Comment No. 14, Section 6.8 Safety Equipment Checklist, Page 6-13

The use of disposable booties should be considered.

Liberty's Response to Comment No. 10

As suggested, the revised attached Section 6.8 of the RD/RAWP for the CSFA has been revised to reflect the use of disposable booties.

We have enclosed three copies of the various Sections, Figures, Tables, and Attachments for the RD/RAWP that were revised in response to the EPA's review comments. Please replace the relevant sections of the July 11 submittal with these revised sections.

We would again greatly appreciate your expedited review of the attached revised work plan as Liberty's construction schedule necessitates the prompt initiation of this work in order to meet the contractual deadlines for construction of the on-site building.

Should you have any questions regarding the contents of this letter or any revisions that were made to the RD/RAWP for the CSFA, or if you require additional information, please do not hesitate to call me.

Sincerely,
PENN ENVIRONMENTAL & REMEDIATION, INC.

Michael A. Christie, P.G.
Vice President

MAC:dlc
Enclosure
4013:csfarespl

cc: Dave Minsker, PADEP (w/2 copies of the enclosure)
Andrew Frebowitz, Tetra Tech NUS (w/2 copies of the enclosure)
Ronald Wagenmann, Upper Merion Township (w/enclosure)
Joseph Bartlett, Upper Merion Environmental Advisory Council (w/enclosure)
Jim Shelton, Malcom Pirnie (w/enclosure)
Jeffrey A. Leed, Leed Environmental, Inc. (w/enclosure)
Thomas Legel, P.E., Advanced GeoServices Corporation (w/enclosure)
Bruce Hartlein, Liberty (w/enclosure)
Brenda Gotanda, Esq., Manko, Gold & Katcher (w/enclosure)
Darryl Borrelli, Manko, Gold & Katcher (w/enclosure)